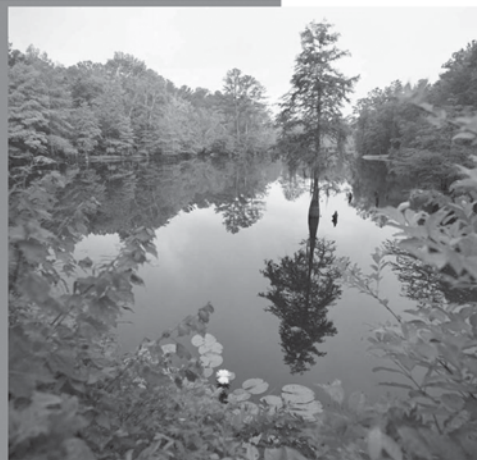


**Public and Stakeholder Comments
on the
Draft Natural Resources Management Plan
with
Department of Energy Comment Responses**

UNITED STATES DEPARTMENT OF ENERGY



NATURAL RESOURCES MANAGEMENT PLAN
For The Savannah River Site



MAY 2005

4/1/05

Comments and Responses to the Department of Energy-Savannah River Draft Natural Resources Management Plan Received at Citizens Advisory Board Meeting North Augusta Community Center (2/22/2005). Comments were recorded by Jim Moore (WSRC)

Sam Booher: Mr. Booher stated he did not like the name “Other Use” and thought the site should come up with a better name. He stated that the center part of this area used to be the Industrial Zone. His suggestion for a name was Threatened and Endangered Species (TES) Area or New Development Area.

Response: *The term “Other Use” originated in the 2000 Red-Cockaded Woodpecker Management Plan to identify all lands not included for habitat management. To clarify the NRMP, the Other Use Management Area has been renamed the “Industrial Core Management Area”.*

Sam Booher: Mr. Booher stated that the NRMP should consider all endangered species.

Response: *In accordance with the Endangered Species Act of 1973, the DOE considers all threatened, endangered, and sensitive species at SRS in its natural resource activities. Section 4.1.1.3 identifies the appropriate plans guiding the management of those species on site, and incorporates them by reference. The reference to the recovery plan for pondberry has been added. The shortnose sturgeon is not likely to be impacted by proposed natural resource management activities. Details of the biology and a review of potential site impacts are discussed in the natural resource assessment (Kilgo and Blake 2005), as cited in the NRMP. The American alligator is listed as threatened by the US Fish & Wildlife Service only because of its similarity in appearance to other crocodilians. Site natural resource management activities that could significantly impact the American alligator are handled through consultation with the SC Department of Natural Resources and the US Fish & Wildlife Service.*

Rick McLeod: How are the aquatic areas (Par Pond and L Lake) being tied in? This Plan does not address the large lake systems such as Par Pond.

Response: *Management of large lake systems like PAR Pond and L Lake fall under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLA is the overriding regulatory compliance driver for management of those sites and the natural resource issues are addressed under the natural resource damage assessment process. This has been clarified in the final NRMP document.*

Bill Lawless: Why don't the Management Areas synchronize with the Integrated Operable Units (IOUs) and Watersheds?

Response: *The IOUs at SRS are conceptual models of units, like watersheds, that facilitate ecological risk assessments, data quality objectives, and remedial investigations under CERCLA. These IOUs are specifically designed to identify contaminant sources,*

transport routes of exposure, and end-point receptors. They can be applied to terrestrial, aquatic, and groundwater systems. The present and proposed Management Areas were designed to achieve Site natural resource management objectives that are largely unrelated to remediation and closure of contaminated sites. The objectives for the Management Areas are not exclusive use, nor are the boundaries inflexible. In cases in which natural resource activities could directly or indirectly impact the contaminant processes in the IOUs (or vice versa), coordination between the responsible organizations is triggered by the mandated Site-Use or Site-Clearance process.

Bill Lawless: There should be a way to bring the public out to SRS to see what is out there.

Response: *The Department of Energy-Savannah River and other on site organizations working at SRS sponsor various outreach and education activities on site through controlled access programs. For example, the Environmental Sciences Field Station, a consortium of 31 colleges and universities, conducts field classes for hundreds of college students. Each year students participate in projects on site as interns through various organizations, including the Savannah River Ecology Laboratory. Scientific and technical conferences are conducted at the University of Georgia Conference Center near Hwy 278. Scientific and engineering program reviews occur routinely on site and involve numerous professionals. Controlled public access also is a consequence of the annual deer hunts and related activities on the Crackerneck Wildlife Management Area and Ecological Reserve. However, as a result of both safety and security concerns, controlled access is limited.*

Eric Nelson: Is a new floodplain wetlands assessment report needed for this new NRMP?

Response: *DOE has reviewed the previous Floodplain/Wetlands Assessment. The actions described under the NRMP are covered under the scope of the previous Wetlands Assessment, which limits harvesting and associated silvicultural activities to 400 acres per year. The objectives in the NRMP focus actions to improve the physical and biological quality of the wetland environment, such as invasive species control or enhancing habitat for native threatened, endangered, and sensitive species. It is not DOE's intention to conduct routine harvesting based upon a regulated schedule similar to other Management Areas.*

Comment and Response to a Funding Question during the Presentation of the Department of Energy-Savannah River Draft Natural Resources Management Plan at the Citizens Advisory Board Meeting North Augusta Community Center (2/22/2005).

Joe Ortaldo, Manuel Bettencourt, and Sam Booher expressed concerns about the funding problems of the Savannah River Ecology Lab, and asked whether profits from the sale of timber could be used to support the Lab.

Response: *The comment or question related to funding of a specific organization like SREL is outside the scope of the NRMP. Revenue from the sale of forest products is returned directly to the U.S. Treasury. The Department of Energy is allowed to submit an annual budget request to obtain funds to pay for the cost of operations and conduct activities that support the continued or sustained flow of the funds. On average the funds spent cannot exceed the revenue generated. Between 1994 and 2003, the actual revenue collected has averaged \$5.23 million dollars, and has ranged from \$3.1 to \$8.3 million dollars. The revenue is a function of the volume sold, unit sale price, harvest schedule, and various other factors. In turn, the budget funds are used to pay for the costs. Over the last decade this revenue has been used to pay for costs related to prescriptions, sale layout and administration, and reforestation and related silvicultural activities (~31 percent). Funds also pay for construction, repair and maintenance of logging roads (~13 percent), a portion of the annual prescribed burning effort (~20 percent); a proportion of the administrative support (~16 percent); support for the SR Archeological Research Program (~2 percent); and research, ecological restoration, and monitoring (~18 percent) in support of the forest products program, such as inventory, regulatory compliance, endangered species, wildlife impacts, and wetland, hardwood, and savanna restoration. Research, ecological restoration, and monitoring are conducted by a large number of Federal and non-Federal organizations depending upon the expertise required, and the ability and interest of the organizations in providing matching funds. Over the last five years, several hundred thousand dollars in forest products-related research funds have been provided to SREL to fund applied studies in direct support of the forest products program when mutual objectives, expertise, and interests existed.*

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Comments and Responses to the Department of Energy-Savannah River Draft Natural Resources Management Plan Received from Sam Booher in an E-mail to Drew Grainger dated January 31, 2005.

Sam Booher: Please process the following comments to the appropriate parties.

While at this point of my reading your Draft SRS NRMP, Jan 05 report, I have no major problem with what is discussed, I am deeply concerned with what I do not find in this report.

I believe that SRS is conducting a lot of good programs for the natural Resources on SRS. I find it hard to believe there are so many areas obviously absent from this report. The following is a quick list that comes to mind immediately of critical on going programs absent from this report. I offer the following are but a few missing missions that are essential to an adequate coverage of DOE Management of Natural Resources efforts on SRS.

1. SRS Gopher Tortoise Rehabilitation and habitat Recovery Program
2. SRS Carolina bay Restoration and Recovery 5 Year Program
3. SRS Wild Hog Elimination
4. SRS Longleaf Pine Habitat Recovery Program
5. SRS Endangered Species Inventory Program Requirement
6. SRS Annual Deer Hunting After Action Report
7. SRS Annual Aquatic Insect Stream Report
8. SRS Surface Water and Groundwater Protection efforts.

Last, while I appreciate all that the USDA - Forest Service does protecting our country's Natural Resources on SRS, I am concerned that NO other agency on SRS provided any input to this report. I would have thought that as a minimum all other agencies would have been pleased to be given the opportunity.

It could probably be explained to me that USDA – Forest Service is not the agency responsible for any of the above eight obviously missing reports. I can understand the USDA – Forest Service being asked to compile the needed information. My response would be then why are the agencies that do these and other missing studies not providing their information along with the Forest Service information.

I would suggest that if the Report is going to be titled US DOE, Natural Resources Management Plan, for SRS, January 2005, then it should include all the information gathered on US DOE, Natural Resources Management for SRS. As it appears the USDA – Forest Service just compiled some Forest Information and is calling it a DOE report.

This is a very misleading report to the Public and DOE about what are all the good things SRS is doing to preserve and protect the Natural Resources on SRS. Maybe the title should be Some of the USDA – Forest Service Efforts on SRS, Jan 05.

Sam Booher
4387 Roswell Drive
Augusta, GA. 30907

Response: *A copy of the draft natural resource assessment was sent under a letter (below) dated February 2, 2005. The publication is available directly through the publisher Island Press. The language in the draft and final NRMP cites the document by reference.*

Sam Boohar
4387 Roswell Drive
Augusta, GA 30907

February 2, 2005

Re: Request for Additional Information Related to SRS Natural Resource Management Plan

Drew Grainger forwarded your e-mail regarding the Draft Plan. In regard to your request for additional information on the 8 program areas, we are enclosing a copy of the natural resource assessment, titled "Ecology and Management of a Forested Landscape." Numerous cooperators from both on-site and off-site organizations contributed to this document to provide the public with a corporate perspective and insight into the ecological and management history of the Savannah River Site. While the document does not cover detailed information on many individual topics, it does provide a fairly comprehensive overview, and was designed specifically to give technical and scientific context to the Draft Plan. Island Press (www.islandpress.org), an independent publisher of environmental books, is publishing the document as a book in June 2005. Because of copyright issues, as well as editing and other changes associated with the publication agreement with Island Press, we ask that you do not copy or distribute the enclosed copy. Thank you.

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Comments and Responses to the Department of Energy-Savannah River Draft Natural Resources Management Plan Received from Ron Malanowski (WSRC) in an E-mail to Drew Grainger dated February 2, 2005.

Ron Malanowski: Abbreviations and acronyms should be eliminated in the document.

Response: *All the acronyms used in the document are listed on p. x. Acronyms are spelled out in the first use. In any subsequent use only the acronym is used.*

Ron Malanowski: Suggest using the phrase “No changes from current management plan” vs. “None”.

Response: *The wording as now used is clear.*

Ron Malanowski: Page 3 Section 2.2 – the statement concerning NERP is misleading.

Response: *The NERP statement paraphrases Strategy ES4.1.4 in the 2000 SRS Strategic Plan (p. 15). The definition of the NERP is provided in the Appendix of the DOE document (DOE/ER-0615P) titled, “National Environmental Research Parks, July 1994, U.S. DOE, Office of Energy Research.*

Ron Malanowski: Pages 23 and 24 – suggest rewriting Section 4.4 to express that SRS will be managed to minimize/mitigate SRS unacceptable impacts on the watershed.

Response: *The first sentence in Section 4.4 on p. 23 has been changed to read “Watershed management efforts are designed to mitigate unacceptable, nonpoint source pollution impacts on SRS watersheds.”*

Ron Malanowski: Suggest that Figure 10 and Table 6 be revised and be consistent with each other.

Response: *The watershed names in Table 6 have been revised to correspond to those in Figure 10.*

Ron Malanowski: Suggested changes (P. 24) concerning watershed boundaries and impacts from SRS activities.

Response: *The map used to delineate and determine watershed impacts was derived from the Hydrologic Unit Code (HUC) map created for South Carolina by USGS and NRCS. On p. 24 (middle of the page) the sentence starting with “The Middle Site Watershed...” has been revised to read, “The Middle Site Watershed represents the interfluvial area between Upper Three Runs and Lower Three Runs, including Fourmile Branch, Pen Branch, and Steel Creek Subwatersheds. In the Lower Three Runs Watershed, only the PAR Pond Subwatershed lies completely within SRS.”*

Ron Malanowski: Page 24 Sec. 4.4 and p. 31 – The web address is incorrect and a copy could not be found.

Response: *The web address has been deleted. The document will be referenced as follows: “Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management,” Federal Register, Vol. 65, No.35, pp 8834-8839, February 22, 2000.*

Ron Malanowski: Page 24 Sec. 4.3.3 - Have efforts ever been made at SRS to stabilize stream channels and mitigate stream bank erosion?

Response: *DOE has made efforts at SRS to stabilize and mitigate stream bank erosion, for example, the old railroad tie storage area near F Area was an extremely eroded embankment that was stabilized and restored to vegetative cover. The project represents an excellent example of successful erosion control work.*

Ron Malanowski: Page 28 Sec. 4.7 – NERP designation as stated in the NRMP is misleading.

Response: *The NERP statement paraphrases Strategy ES4.1.4 in the 2000 SRS Strategic Plan (p. 15). The definition of the NERP is provided in Appendix of the DOE document (DOE/ER-0615P) titled, “National Environmental Research Parks, July 1994, U.S. DOE, Office of Energy Research.*

Ron Malanowski: Page 28 Sec. - End of section 4.7 – rewording of the 2nd bullet is needed, i.e. NERP.

Response: *The designation of Savannah River Site as a NERP does not mean the entire site is afforded the same protection as the set-asides.*

Comments and Responses to the Department of Energy-Savannah River Draft Natural Resources Management Plan Received from Jon Peterson in an E-mail to Jim Moore (WSRC) dated March 1, 2005.

Peterson: Thanks for forwarding the copy of the "SRS Natural Resources Management Plan".

I have looked at it and found that it seems to adhere to recognized resources management standards. I do have one question about current practices. I noticed that you manage the brush in the forestry plan by chemical application and by controlled burns. I am concerned about the effect on protected species of potential products of combustion in areas that had chemical applications followed by controlled burns. The smoke and other byproducts of the burn may drift into the habitat of the protected species. What precautions are taken to prevent this and are dangerous toxins produced by the controlled burns?

Many thanks for your assistance with this issue!

Jon M. Peterson

Response: *No special precautions are taken with regard to smoke exposure for protected species, except to prevent direct damage from the flames and heat. Numerous studies of chemical and particulate matter in smoke from prescribed fires in the South have been conducted to assess human- health impacts. Several of these projects have been conducted on the Savannah River Site, including an update of the Environmental Protection Agency Air Emissions from prescribed burning, and an on-going study to measure the amount of particulate matter downwind from fires as well as carbon monoxide exposure to the firefighters. While numerous chemicals and particulates are produced, potential, human- health related exposures appear to occur only for short periods near the fires in very dense smoke. Dispersal of the smoke plume well above the ground and over large areas limits exposure to toxic chemicals. By analogy, and because many of the native protected species are adapted to fire (e.g., red-cockaded woodpecker), no negative impacts are likely to occur. Animals in particular have the ability to move away from both fire and smoke, and to seek temporary refuge. Many native plant species in the forested areas that are burned are adapted to, and respond positively to, fire.*

Dr. P. Bush at the UGA Pesticide & Hazardous Waste Lab conducted a review in 2000 of their work and others in regard to the use of pesticides and the potential for the pesticides to be present in smoke from fires in these areas (2000 Proceed. Tall Timbers Fire Ecology Conference, pages 132-136 titled Fire and Pesticides). Burning usually occurs 180 days or longer after application. During that time commonly used forestry herbicides dissipate in the soil and breakdown. The residues that remain are frequently destroyed during combustion. None of the studies in the field reported detectable quantities of herbicides in the smoke adjacent to the burns. These observations also are confirmed by the fact that forestry herbicides have not been detected in regional air mass samples or rainfall in nationwide air quality studies. In contrast, agricultural herbicides have been detected.

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Comments and Responses to the Department of Energy-Savannah River Draft Natural Resources Management Plan Received from Laura Janacek (SREL) in an E-mail to Drew Grainger dated March 2, 2005.

SREL: This document is not very informative. Little detail is provided, making it difficult for the reader to effectively evaluate the proposed actions or the justifications for such.

Response: *Comment noted.*

SREL: SREL assumes that a new Natural Resources Operations Plan will be written to provide specific guidance for the natural resource management activities highlighted in the NRMP. Thus, SREL requests that we be provided an opportunity to have input to the new Operations Plan, as that is the document that will contain specific guidance regarding the management of SRS natural resources.

Response: *DOE will ensure the operations, resource prescriptions, and project- specific plans will continue to be developed with input from site organizations, as appropriate. The new NRMP is different by design. It is not intended to be prescriptive, but to allow flexibility to accommodate DOE missions, to facilitate and to encourage adaptive management, and to offer a synergistic approach in response to new science, new technology platforms, and changing public values.*

SREL: All photographs should be credited to the photographer and organization.

Response: *Credit has been given to only photos taken by nongovernment employees.*

SREL: SREL recommends that actions taken to implement the NRMP regularly consult with the companion document, "Ecology and Management of a Forested Landscape: Fifty Years of the Savannah River Site" (*in press*).

Response: *The companion document already is referenced in the NRMP and will be used to support any environmental analysis.*

SREL: DOE Set-Asides should always be capitalized.

Response: *Changes completed.*

SREL: There is no mention in the document of the role that other site organizations play in natural resource management issues. As currently written, this document implies that USFS-SR manages all the programs described, which is not the case.

Response: *DOE purposely did not include the names of the various organizations or their scope of work because the intent was to write a management plan for the natural resources, and not a plan to manage the organizations. The latter is covered under the various contracts and agreements. Please see the introductory paragraph on Page 1 of the NRMP.*

SREL: Executive Summary: Page iii, column 1, third paragraph: Added to this paragraph of changes since the last (1991) NRMP should be a mention of the following:

- Thirty DOE Research Set-Aside Areas were defined, and separate management plans are being developed for each.
- The UGA Conference Center has been established on 68 acres off Highway 278. A management plan has also been developed for this property, which is used primarily by SREL to host scientific meetings and environmental outreach activities.

Response: *Page 27 under 4.6 states, “There are 14,005 acres in 30 separate Set-Asides (Figure 11)...” Additionally, the program goal is to continue to develop set-aside management plans. DOE feels the statements are adequate for the intent of the plan.*

Response: *DOE feels the Conference Center information is more appropriate to another document than the NRMP.*

SREL: Page iii, column 2, line9: “separated” is misspelled.

Response: *The spelling has been corrected.*

SREL: Page iii, column 2, final 2 paragraphs: Vague “justifications” are provided for future harvesting and timber management in the Savannah River Swamp and the Lower Three Runs Creek (LTRC) corridor. The NRMP states that both of these areas have had “...limited management during the last decade.” However, SREL is aware of no management that has been conducted in either of these areas in the past decade. The current Environmental Assessment (EA) for the SRS (“Environmental Assessment – Natural Resource Management Activities at the savannah River Site,” DOE/EA-0826, July 1993) explicitly states (page 5, 4th paragraph) that “No timber harvesting will occur in ...the swamp or the LTRC corridor...” Given that this EA is the most current document governing natural resource management activities on the SRS, it should be cited in the draft NRMP), and a solid justification should be presented in the new NRMP if the existing policy of no harvesting in the swamp or LTRC corridor is to change. To simply identify a laundry list of generic “objectives” for introducing possible timber harvesting and silvicultural activities into these areas does not adequately explain the need to now manage these areas, nor the means by which the USFS-SR can minimize the ecological damage resulting from harvesting or deal with any contaminated sediments that could potentially be disturbed during timber harvesting.

Response: *Felling of trees, site preparation (e.g., herbicides and burning), beaver and hog control, and planting of wetland or bottomland hardwood species have occurred since 1990 in these Management Areas as part of restoration or research activities. The actions described under the NRMP are covered under the scope of the previous Floodplain/Wetlands Assessment, which limits harvesting and associated silvicultural activities to 400 acres per year. The objectives in the NRMP as stated are clear and focus actions to improve the physical and biological quality of the wetland environment, such as invasive species control or enhancing habitat for native threatened, endangered,*

and sensitive species. DOE does not intend to conduct routine harvesting based upon a regulated schedule similar to other Management Areas.

SREL: Page IV: If this is to adequately reflect changes to SRS natural resources since the last NRMP was adopted, the proposed new “management” of the Savannah River Swamp and the Lower Three Runs corridor should be listed on this page under the “Forest Products Harvesting and Silvicultural Management,” “Fire Management,” and “Habitat, Population and Invasive Species, TES Species Management” headers.

Response: *Only conditions that have changed are listed. The language for the SR Swamp Management Area and LTRC Management Area clarifies and gives better direction than was previously stated in the NRMP (1991).*

SREL: Cultural Resources are not listed.

Response: *Cultural resources are listed on p. 29 under 4.7 (Research) and again under the paragraph on goals (same page). DOE does not intend for the NRMP to be a cultural resource plan.*

SREL: Introduction (Chapter 1) Page 2: Need to add the Set-Aside Management and Protection Plan (1993) to this list of documents that influence natural resources on the SRS.

Response: *The Set-Aside Management and Protection Plan (1993) is included in the Appendix of the publication, “DOE Research Set-Aside Areas of the Savannah River Site (1997),” which is cited in the NRMP. The information is more appropriate to operations plans.*

SREL: Overall Direction (Chapter 2). The current USFS-SR ID Team process is never mentioned in this document. If the ID Team is no longer functioning, the process by which site stakeholders will have a voice in natural resource management decisions on the SRS needs to be detailed in the NRMP.

Response: *DOE has determined that the Site Interdisciplinary Team Process is an operational-implementation mechanism that is likely to continue because of its functional value.*

SREL: Page 3, column 2, final paragraph: Added to this paragraph of changes since the last (1991) NRMP should be a mention of the following:

- Thirty DOE Research Set-Aside Areas were defined, and separate management plans are being developed for each.

Response: *Same response as under SREL comment Page iii column 1, 3rd paragraph.*

- The UGA Conference Center has been established on 68 acres off Highway 278 in Aiken County. This facility is used primarily by SREL to host scientific meetings and

environmental outreach activities. A management plan has also been developed for this property.

Response: *DOE feels the Conference Center information is more appropriate to another document rather than the NRMP.*

SREL: Management Areas (Chapter 3) Page 5, section 3.1 Other Use Management Area (MA 1): USFS-SR might consider other names for this management area. “Other Use” is confusing. Perhaps something like “Mission Support” would be a better descriptor.

Response: *The term “Other Use” originated in the 2000 Red-Cockaded Woodpecker Management Plan to identify all lands not included for habitat management. To clarify the NRMP, the Other Use Management Area will be renamed the “Industrial Core Management Area.”*

SREL: Consider opportunities to improve habitat connectivity between significant Carolina bay systems (notably, Dry Bay in Compartment 11, and Ellenton Bay system in Compartment 6; See Figure 3, Page 7).

Response: *Comment noted.*

SREL: Page 5; section 3.2 Red-Cockaded Woodpecker Management Area (MA 2): Citation for the first sentence should include the federal driver that mandates the natural resource management decisions described (RCW Recovery Plan, etc.), not just the figures that indicate the location of the RCW Management Area on the SRS.

Response: *The RCW Management Plan (2000), which is cited on page 5, Section 3.2. on page 3, Section 2.3, and in the references, includes the Federal driver.*

SREL: SREL applauds USFS efforts to create savanna habitat and restore savanna ecosystem. We strongly encourage increased use of growing season prescribed burning (to the extent possible) to better restore native savanna species.

Response: *Comment noted.*

SREL: Pages 5-6, section 3.4 Crackerneck Wildlife Management Area and Ecological Reserve (MA 4): SREL encourages USFS-SR to be sensitive to the significant numbers of Carolina bays and wetland depressions in this area. We recognize that new timber operations are planned for this area and wish to emphasize that continued implementation of the established ID Team process will ensure that SREL’s concerns, and those of other site organizations, are appropriately addressed when timber operations, prescribed burns, etc. are planned for Crackerneck.

Response: *Comment noted.*

SREL: Page 6; section 3.5 Savannah River Swamp Management Area (MA 5): Contrary to the statement in the draft NRMP, SREL is aware of no management that has been conducted on this area during the past 10 years.

Response: *Some silviculture and harvesting activities have occurred in the SR Swamp and LTRC as part of research and restoration activities, e.g., Pen Branch.*

SREL: Because it is not part of this management area, restoration of the Pen Branch corridor does not need to be mentioned in this section.

Response: *The restoration work in Pen Branch Delta did occur in the SR Swamp Management Area.*

SREL: Why are beaver control activities conducted in the swamp? There should be no roads or culverts in this area to be negatively impacted by beaver activity.

Response: *Beaver control activities were conducted to allow planted trees to become established.*

SREL: The current Environmental Assessment (EA) for the SRS (“Environmental Assessment—Natural Resource Management Activities at the Savannah River Site;” DOE/EA-0826, July 1993) explicitly states (page 5, 4th paragraph) that “No timber harvesting will occur in ...the swamp....” Given that this EA is the most current document governing natural resource management activities on the SRS, it should be cited in the new NRMP (the EA is currently not cited in the draft NRMP), and a solid justification should be presented in the new NRMP if the existing policy of no harvesting in the swamp is to change. To simply identify a laundry list of generic “objectives” for introducing possible timber harvesting and silvicultural activities into this area does not adequately explain the need to now manage the swamp, nor the means by which the USFS-SR will protect this area from ecological damage as a result of harvesting or deal with any contaminated sediments that could potentially be disturbed during timber harvesting.

Response: *The actions described under the NRMP are covered under the scope of the previous Floodplain/Wetlands Assessment, which limits harvesting and associated silvicultural activities to 400 acres per year. The objectives in the NRMP, as stated, are clear and focus actions to improve the physical and biological quality of the wetland environment, such as invasive species control or enhancing habitat for native threatened, endangered, and sensitive species. DOE does not intend to conduct routine harvesting based upon a regulated schedule similar to other Management Areas. Any actions that could potentially disturb contaminated sediments are addressed through consultation with designated DOE Closure Managers, Federal and State regulatory agencies, and are further subject to the Site-Use or Site-Clearance to identify conflicts among organizations.*

SREL: How will USFS-SR gain access to this area if timber operations are conducted? Are private land owners going to grant access?

Response: *Access will be addressed on a project- specific basis.*

SREL: SREL encourages USFS to be sensitive to the importance of a large contiguous forested block of floodplain forest habitat. Looking at this region from a larger-than-SRS landscape perspective, the contiguously forested swamp forest on the SRS is unique within the adjacent South Carolina and Georgia landscape. Consequently, SREL does not recommend that harvesting or other silvicultural activities be conducted in the Savannah River Swamp.

Response: *Comment noted.*

SREL: Page 6, section 3.6 Lower Three Runs Corridor Management Area (MA 6): Contrary to the statement in the draft NRMP, SREL is aware of no management that has been conducted on this area during the past 10 years.

Response: *Previously answered under SREL comment for page 6 section 3.5.*

SREL: SREL does not recommend that harvesting or other silvicultural activities be conducted in the Lower Three Runs Creek corridor.

Response: *Comment noted.*

SREL: Figure 3, page 7: Set-Aside #2 in Timber Compartment 19 is not shown. Why is Timber Compartment 86 split between two management areas (Other Use and RCW)?

SREL: Figure 4, page 8: Set-Aside #2 in Timber Compartment 19 is not shown. Why is Timber Compartment 86 split between two management areas (Other Use and RCW)?

SREL: Figure 5, page 9: Set-Aside #2 in Timber Compartment 19 is not shown.

SREL: Figure 6, page 10: Set-Aside #2 in Timber Compartment 19 is not shown.

SREL: Figure 7, page 11: Set-Aside #2 in Timber Compartment 19 is not shown.

Response: *Changes to Figures 3, 4, 5, 6, and 7 have been made. Compartment 86 was split based on management suitability for the red-cockaded woodpecker recovery at the time the most recent plan was written.*

SREL: Management Programs (Chapter 4). Page 13, section 4.1 Habitat, Population and Invasive Species, and TES Species Management: SREL suggests that an SRS-specific sensitive species list be compiled for SRS as is done on National Forest lands. This list would include species that are significant to the SRS and would expand beyond federally-listed T&E species. Such a list could be compiled in collaboration with SCDNR's new state Wildlife Management Plan, SREL and USFS-SR expertise, and by consulting the already identified companion document "Ecology and Management of a Forested Landscape: Fifty Years of the Savannah River Site."

Response: *USFS-SR has compiled, maintained, and updated a TES species list for SRS for more than a decade. Numerous Federal, State, and private conservation*

organizations were consulted in the preparation and update. The information is provided in detail in the natural resource assessment (Kilgo and Blake 2005).

SREL: Page 14, Figure 9: The figure legend identifies a “Management Area”, but no such area is outlined on the accompanying map. Figure 9 would be improved by adding Set-Aside Areas and Timber Compartment boundaries or Management Areas.

Response: *Management Area has been deleted from the legend. The purpose of Figure 9 is to illustrate general distributions and not detail.*

SREL: Page 15, last bullet, top of page: Please define what a “comprehensive approach” to TES species management is, and how it differs from other approaches.

Response: *The term comprehensive approach means that DOE will consider all suitable strategies for managing TES populations in conjunction with recovery plans and how those strategies relate to larger land management issues.*

SREL: Page 15, section 4.1.1.1 Habitat Management: SREL is aware of a collaborative research project between USFS-SR and SREL involving introduced gopher tortoises on the SRS, but not of a formal reintroduction plan. If the NRMP states that “...gopher tortoises...are being reintroduced.” to the SRS, SREL recommends that a formal plan for the management of these introduced animals be developed in collaboration with SREL, and that the plan be cited in the NRMP.

Response: *Comment noted.*

SREL: Page 15, section 4.1.1.2 Population and Invasive Species Management: In Table 1 there is no obvious correlation between number of site employees and deer-vehicle accidents. This table seems to serve no purpose and can be removed; alternatively, delete the “Employees” column and just show the year and number of deer-vehicle accidents.

Response: *DOE’s intent is to show that despite the decline in the workforce the high rate of deer-vehicle collisions continues. It illustrates the need for deer management activities to continue.*

SREL: Please elaborate on what “Alternative biological control practices...” are in reference to invasive species management.

Response: *Alternative biological control practices refers to new technologies that limit invasive species reproduction, such as those discussed at the 2004 Wild Pig Symposium held in Augusta, GA.*

SREL: The turkey hunts, limited to mobility impaired hunters, have been conducted recently on the general site. If such hunts are planned to continue in the future, they should be mentioned in the NRMP along with deer and hog hunts.

Response: *The turkey hunts for mobility impaired hunters are evaluated annually by DOE.*

SREL: Page 16, section 4.1.1.3 TES Species Management: Please elaborate on what actions are being implemented to protect the population of pondberry recently found on the SRS.

Response: *The Federal recovery plan for pondberry will be cited in the document.*

SREL: Column 2: insert the word “for” as follows—“The RCW recovery objective for RCWMA is 315 groups and for SRCWMA is 103 groups.”

Response: *The sentence has been corrected.*

SREL: Page 17, section 4.1.1.4 Monitoring, Inventory, and Survey: Please add the following terms and their definitions to the glossary: monitoring, inventory, survey. It is unclear from the text how these activities differ from one another.

Response: The definitions of these terms have been incorporated in the Glossary.

SREL: Page 17, Table 2: there is an error in the first line (1952), total pine—should be 12.7 (not 13.7). This table is four years out of date and should be updated to include data for 2004.

Response: *The error has been corrected. Table 2 represents actual measured forest inventory data that is updated approximately every ten years through field measurement of more than 600 hundred plots uniformly distributed across the site.*

SREL: Page 17, section 4.2 Forest Products Harvesting and Silviculture Management: First sentence, suggest rewrite as follows—

“Forest products harvesting and silviculture management are conducted to provide a variety of forest conditions to meet security needs, ~~to~~ encourage habitat development for TES ~~plant and animal~~ species, promote forest health, and ~~to~~ generate revenue from the sale of forest products.”

Response: *The sentence has been changed.*

SREL: Page 18, first paragraph: Should add that harvesting activities also include salvage and sanitation operations as a result of damage from fire, wind, ice, etc.

Response: *The information has been incorporated.*

SREL: Page 18, Table 3: Update table to include data from 2004.

Response: *Data for 2004 has been added.*

SREL: Page 18, column 2, program goals: First bullet: “Continue to manage and develop habitat...” is a stated goal. Specific information on what “habitat” (i.e., sandhills, longleaf savannah, bottomland hardwood, etc.) is being managed and developed should be included.

Response: *In this context, habitat refers to a broad continuum of vegetation composition and structure, as well as other physical factors, that enhance a given species or suite of species. As such, a simple community descriptor is not appropriate. The sentence is changed to read, “Continue to manage and develop habitat for native species and communities.”*

SREL: Third bullet: More specifics are needed regarding the stated goal to “Continue to manage hardwood stand composition to improve the diversity of both age and species.”

Response: *Specifics of diversity of hardwood species composition and age are considered in compartment prescriptions, and depend upon the local soil and site conditions, plant and animal population and community objectives, and prior land use. In general, diversity implies more variation in composition and structure of these stands.*

SREL: Page 19, section 4.2.1.1 Harvesting: SREL agrees with assessment that the oak component on the SRS has declined. Thus, we suggest that as slash pine is removed, more opportunities are evaluated for oak and other hardwood regenerations.

Response: *Comment noted.*

SREL: It is unclear from this section whether cutting of hardwoods on the SRS will increase in the future. If so, this should be stated more clearly in the text.

Response: *The actual harvesting of hardwoods is well below targets. There is some expectation it will increase, dependent on individual compartment prescriptions.*

SREL: Page 19, section 4.2.1.2 Silviculture Longleaf plantings are applauded, but if mechanical plantings occur at plantation-type densities, the potential ecological value of longleaf are not achieved.

Response: *Research is currently being conducted on site regarding appropriate densities, timing, and methods for regulating overstory pine and mid-story woody plant densities to restore and sustain ecological values associated with longleaf fire savannas. Several thousand acres of longleaf have been pre-commercially thinned, planting densities have been reduced, and fire has been introduced to these stands as early as age two in order to control mid-story hardwood trees and shrubs.*

SREL: General Comment about silviculture and clear-cuts: USFS-SR should work to maintain visual “buffers” on large clearcuts (i.e., the recent clearcuts along SRS 1 are unsightly). The public’s reaction to those large clearings has not been favorable.

Response: *The clearcut along SRS 1 was a consequence of the severe 2004 ice storm and the anticipated need to control the spread of southern pine beetle. DOE is aware of the desirability of visual buffers.*

SREL: Page 20, section 4.2.2 Expected Future Conditions

Expectation is more large expanses of forested savanna. This ecological result is to be applauded.

Response: *Comment noted.*

SREL: Page 20, Table 4: This table suggests some significant changes in the distributions of community types on the SRS in the future, as compared to the present conditions, yet no explanations are offered in the text for how such shifts will be accomplished. Explanations should be provided in the NRMP for how these shifts in community types will occur (i.e. will more upland hardwood be planted in the future? will reservoirs be drained and converted to bottomland hardwoods, etc?).

Response: *Table 4 has been modified to show how the estimates were derived. Errors in the future percentages have been corrected, which resulted from differences in the base GIS layer used to derive the estimate. Natural development of forest stands at SRS has resulted in an enormous increase in the amount of hardwood and mixed-pine-hardwood (Table 2), and, coupled with planting, DOE expects an increase in these stand types in the long- term future. Disposition of reservoirs is subject to CERCLA; therefore, no decision on the reservoirs can be made in the proposed NRMP.*

SREL: Please explain why the “Carolina Bays” category increases in the future and the “Surface Water” category decreases in the future.

Response: *Table 4 has been modified to show how the estimates were derived. Errors in the future percentages have been corrected, which resulted from differences in the base GIS layer used to derive the estimate.*

SREL: Page 22, first paragraph: Please clarify what is meant by the statement—“Some viewed landscapes on SRS are along secondary roads.”

Response: *The sentence as written appears to be confusing and has been deleted.*

SREL: Page 23, section 4.3.1.2 Boundary Maintenance: Should indicate that perimeter gates are kept locked.

Response: *DOE feels the information is not appropriate to the NRMP.*

SREL: Page 24, second paragraph: Third sentence should be rewritten as follows—
“~~In~~ Upper Three Runs Creek sub-watersheds include Tims Branch and Tinker Creek.”

Response: *The sentence has been rewritten to be consistent with United States Geological Survey topographic maps.*

SREL: Page 24, section 4.4.1 Current Management Activities: Second sentence, strike the second “the” as follows—“Due to the hardening of surfaces on these areas, ~~the~~ runoff intensity is magnified.”

Response: *The sentence has been corrected.*

SREL: Page 25, Photograph 10 caption: rewrite as follows—“Prescribed ~~fire is~~ burns are one method of decreasing the likelihood of a severe wildland fire.”

Response: *Prescribed fire is the preferred term.*

SREL: Page 26, Table 7: This table should be updated to include 2004 data.

Response: *Data for 2004 has been added.*

SREL: Page 26, section 4.5.1.2 Prescribed Fire:

An increase in the amount of growing season fires is commended and encouraged.

Response: *Comment noted.*

SREL: Page 27, section 4.5.2 Expected Future Conditions:

Text should elaborate on exactly how “Areas surrounding facilities and infrastructure will be treated to reduce the risk of wildland fire.”

Response: *Refer to Section 4.5.3.*

SREL: Page 27, section 4.6 Set-Asides: There is no mention in this section that the Savannah River Ecology Laboratory (SREL) is the actual custodian of the 30 DOE Research Set-Aside Areas, responsible for the day-to-day management of these areas. SREL also chairs the Set-Aside Task Group, the governing body that ultimately is responsible for management decisions regarding these areas.

Response: *DOE purposely did not include the names of the various organizations or their scope of work because the intent was to write a management plan for the natural resources, and not a plan to manage the organizations. The latter is covered under the various contracts and agreements. Please see introductory paragraph on Page 1 of the NRMP.*

SREL: Management plans for each Set-Aside are being written by SREL, with input from WSRC, SCDNR, and USFS-SR. The first sentence, second paragraph, column one, should be rewritten as follows—Existing Management plans for each Set-Aside are being written by SREL, with input from all interested site organizations, to meet the research objectives and desired future habitat conditions for each area.”

Response: *Same response as above.*

SREL: Set-Asides should always be capitalized.

Response: *Corrections made.*

SREL: Page 28, Figure 11: This is an older version map of the DOE Research Set-Aside Areas. Please update with a current map that correctly indicates that the locations of the current Set-

Asides (i.e. the current map should not include Cypress Grove [old Area 9], but should include the replacement areas Stave Island [Area 9A] and Georgia Power [Area 9B]).

Response: *Figure 11 has been corrected.*

SREL: Page 29, section 4.7 Research: Rewrite the first sentence, as it is currently confusing in its meaning.

Response: *The sentence is clear as stated.*

SREL: Define what a NERP is.

Response: Although the definition is *evolving*, the original concept is outlined in the Appendix of the DOE document (DOE/ER-0615P) titled, “National Environmental Research Parks, July 1994, U.S. DOE, Office of Energy Research.

SREL: There should be an indication in this section that the “Research, education, and outreach activities...” are implemented by several organizations (SREL, USFS-SR, WSRC, and USC-Archaeology) and are complementary. It is probably a stretch to say that all of these activities undertaken by all of these organizations are “integrated” with one another.

Response: *Same response as given for SREL comment on P. 27 Section 4.6.*

SREL: Second column: the research described here is conducted by SREL, yet SREL is never mentioned. Similarly, USC-Archaeology is not identified as responsible for cultural resources programs. The organizations who are actually conducting these programs should be identified as such in this document.

Response: *Same response as given for SREL comment on P. 27 Section 4.6.*

SREL: Page 30, Photograph 12: Please change citation to David E. Scott, Savannah River Ecology Laboratory.

Response: *Corrected.*

SREL: Page 30, first column: Capture of native migratory birds is governed not only by the Federal Bird Banding Laboratory, but also by the U.S. Fish and Wildlife Service Permits Division if any “research” will be conducted on the bird after capture, or if any feathers, egg shells, etc. will be collected for research use. SREL is also subject to University of Georgia Animal Care and Use regulations, and every animal project that is conducted by SREL must be approved by the UGA Institutional Animal Care and Use Committee.

Response: The sentence has been changed to read: “*Sampling requires a permit from the U.S. Fish and Wildlife Service Permits Division if any research will be conducted on the bird after capture, or if any feathers, egg shells, etc. will be collected for research.*”

SREL: Page 30, section 4.7.2 Expected Future Conditions: Suggest rewording the first sentence to simplify—“Research activities in the various MAs and the Set-Asides will be consistent with the overall management plans for those lands.”

Response: *The sentence has been changed.*

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Comments and Responses to the Department of Energy-Savannah River Draft Natural Resources Management Plan Received from Eric Nelson & Lynn Wike (SRNL) in an E-mail to Drew Grainger dated March 2, 2005.

SRNL-EST-2005-040:

SRNL: This document is obviously written as a high level guidance manual. However, even at that level, there are some serious issues that must be addressed prior to finalization. The list of policies, orders, etc in Chapter 1 that influence the NRMP are obviously lacking in the documents that impact wetland activities on-site at SRS. Obvious additions need to include:

Clean Water Act Section 404

Rivers and Harbors Act

Executive Order 11988 – Floodplain Management

Executive Order 11990 – Protection of Wetlands

Executive Order 13112 – Invasive Species

Sec. of Energy No Net Loss of Wetlands Policy

EPA Statement of Policy on Protection of Wetlands

SC DHEC Water Quality Certification (61-101)

DOE-SR Manual for Wetland Activities on the SRS

DOE-SR Policy SRP 04-05 Stream Management Policy UTR

These are mainly directed to wetland and floodplain activity. As other specific comments will address later, the document has the potential to adversely impact the way management of these types of habitat are conducted in the future at SRS.

Response: *DOE has added the Executive Orders, Clean Water Act, and Rivers and Harbors Act. The remainder is considered to be operational guidance and is available in reference to operational planning. (Response to SRNL desired change “1”)*

Since this is a high level document, the actual implementation of the NRMP will be through the yet to be prepared NRM Operations Plan. This was the mechanism implemented with the 1991 management plan and has been used for the compartment and stand level management of natural resources at SRS. This Operations Plan will detail the actual potential impacts of the NRMP, yet its drafting and mechanism for receiving comments prior to finalization are never mentioned. Because the NRMP opens some previously closed options to harvesting and silviculture, this Operations Plan will be extremely significant, and should not be drafted without clearly defined mechanisms for outside input and comment. This should be clearly outlined in the NRMP.

Response: *DOE will ensure the operations, resource prescriptions, and project- specific plans will continue to be developed with input from Site organizations, as appropriate. The new NRMP is different by design. It is not intended to be prescriptive, but to allow flexibility to accommodate DOE missions, to facilitate and to encourage adaptive management, and to offer a synergistic approach in response to new science, new technology platforms, and changing public values. (Response to SRNL desired change “2”)*

SRNL: This document dramatically shifts the use of harvesting and silvicultural activities in the Savannah River Swamp (MA5) and the Lower Three Runs Corridor (MA6) Management Areas. These activities were previously not allowed in the 1991 plan and the Environmental Assessment that was prepared to implement the plan (DOE/EA-0826). If this activity level in wetlands is changed according to the new NRMP, I believe that the prior EA and the Floodplain Wetlands Assessment, which is required by 10 CRF 1022, will not be valid for the new plan. As such, this will require new NEPA documentation to support the new NRMP. When asked at the public presentation of the plan to the CAB what type of specific management objectives would necessitate the harvesting and silvicultural activities in these areas, representatives of the Forest Service provided only vague possible scenarios of when this would be needed. Unless more convincing reasons to bring these activities into these wetlands can be enumerated, it would be preferable to continue the exclusion of harvesting from these two management areas. If a specific situation should arise in the future, a specific management plan to address that need can be formulated and implemented. This has been done previously to provide needed silvicultural activity into SRS Set-Aside areas (Flamingo Bay, Set-Aside No. 21). The need for the activity was formulated and a plan prepared through the Forest Service ID Team process. That plan was then presented to the Set-Aside Committee for consideration and review. Upon approval of the appropriate authorities, the activity could be initiated. This specific intervention strategy is preferable to granting harvesting and silvicultural activity to support unspecified management objectives in these wetland areas.

Response: *DOE has reviewed the previous Floodplain/Wetlands Assessment. The actions described under the NRMP are covered under the scope of the previous Floodplain/Wetlands Assessment, which limits harvesting and associated silvicultural activities to 400 acres per year. The objectives in the NRMP, as stated, are clear and focus actions to improve the physical and biological quality of the wetland environment, such as invasive species control or enhancing habitat for native threatened, endangered, and sensitive species. DOE does not intend to conduct routine harvesting based upon a regulated schedule similar to other Management Areas. Any actions that potentially could disturb contaminated sediments are addressed through consultation with designated DOE Closure managers, Federal and State regulatory agencies, and are further subject to the Site-Use or Site-Clearance to identify conflicts among organizations. Project specific activities in wetlands are further subject to additional Federal and State policies, guidelines and permitting. The specific case mentioned referencing Flamingo bay reinforces the need for flexibility to have silvicultural and harvesting tools available to meet the objectives in the NRMP, rather than rewriting or amending the NRMP to satisfy each project implementation plan. (Response to SRNL desired change "3")*

SRNL: None of the activities outlined in Section 4 pertaining to management programs, goals, current activities, and proposed changes would necessitate changing the current policy regarding MA5 and MA6. Again, if no change in management of these areas can be detailed, no need for change in harvestability status should be specified. Using specific project exceptions to the no intervention policy would allow separate NEPA evaluation of specific activities, and therefore cover the wetland policies at SRS. With this mechanism available, and no change to the prior management direction of these two areas, the significant deviation from the prior EA will be

eliminated. DOE may then more favorably evaluate the need for a new or updated NEPA documentation to support the NRMP.

Response: *Refer to previous response concerning MA 5 and 6.*

SRNL: Invasive species, especially plants, pose one of the biggest and most rapidly growing environmental problems around the world and we should be giving it some serious consideration at SRS. An expansion of Section 4.1.1.2 to indicate our intention to prevent introduction, detect and respond rapidly to control populations, monitor populations accurately, restore native species and habitats lost, conduct research for control and prevention of introduction, and promote public education in relation to invasive species as directed by the Executive Order would be of value.

Response: *DOE considers the current level of commitment to monitoring and control of invasive species adequate; however, if circumstances change, additional requirements will be assessed. (Response to SRNL desired change “4”)*

Desired changes to the document are:

- 1) Include pertinent wetland policy, order, and legislation documents in Chapter 1 that regulate activities on SRS.
- 2) Specify the mechanism and timing of public involvement and review of the Operating Plan that will implement the new NRMP. This is essential due to the potential interpretation of the non-specific management objectives in the document.
- 3) Return MA5 and MA6 to no harvest status and use specific exceptions as necessary to conduct active intervention in these areas. If not returned to this status, consider the necessity of new NEPA documentation to support the radical change in potential impact to wetland systems at SRS.
- 4). Expand our commitment to monitor and control invasive plant species as part of the management plan for SRS natural resources.

Response: *See Responses given under each paragraph.*

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Comments and Responses to the Department of Energy-Savannah River Draft Natural Resources Management Plan Received from Richard Brooks (SRARP) in an E-mail to Drew Grainger dated March 3, 2005.

The SRARP has no objections to the draft NRMP and feels that it represents Cultural Resource Management as it should. We recognize that this is: not a Cultural Resource Management document; that the NRMP acknowledges responsibility toward Cultural Resource Management (perhaps further acknowledgement could be made in the section on timber management); and that the NRMP will be coordinated and implemented with the Site Use System.

Our biggest concern is the health and well-being of the Site Use System. As long as the Site Use System is adhered to most conflicts can be resolved. The SRARP feels that a sentence should be added to a bullet on page 3. We think the bullet should read (new sentence in italics):

Close cooperation will be maintained among organizations when managing and protecting SRS natural resources. *This will be coordinated and implemented through strict adherence to the Site Use System.*

Response: *DOE will continue to maintain close cooperation among SRS organizations through the use of the Site- Use System. The Site-Use and Site Clearance process has been effective for conducting day- to- day operations for many decades. Compliance with the Site-Use system already is mandated under the 'Site Infrastructure and Services Manual Procedure 3.02, Rev 4. Effective 7/23/03. This procedure covers all organizations as follows: "Scope: This procedure is applicable to all organizational elements of SRS, including design agencies, subcontractors, and coordinating land users (USFS, SREL, etc.)."*

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Comments and Responses to the Department of Energy-Savannah River Draft Natural Resources Management Plan Received from Mike Caudell (SCDNR) in an E-mail to Drew Grainger dated March 2, 2005.

SCDNR: The SCDNR supports the NRMP as written, but must point out the extremely general nature of this document. Most of the goals and directions are laudable and logical, but no specifics are offered as to how accomplishments will be achieved. The SCDNR would like to be involved in formulating the Operations Plan.

Response: *DOE will ensure the operations, resource prescriptions, and project specific plans will continue to be developed with input from site organizations as appropriate. The new NRMP is different by design. It is not intended to be prescriptive, but to allow flexibility to accommodate DOE missions, to facilitate and to encourage adaptive management, and to offer a synergistic approach in response to new science, new technology platforms, and changing public values.*

SCDNR: I do have specific concerns about general proposals to conduct timber management and prescribed burning in the Savannah River Swamp (MA5) and the Lower Three Runs corridor (MA6). The logistics and advisability of these proposals seem questionable, but without specific proposed actions and locations, intelligent comments are not possible.

Response: *DOE has reviewed the previous Floodplain/Wetlands Assessment. The actions described under the NRMP are covered under the scope of the previous Floodplain/Wetlands Assessment, which limits harvesting and associated silvicultural activities to 400 acres per year. The objectives in the NRMP as stated are clear and focus actions to improve the physical and biological quality of the wetland environment, such as invasive species control or enhancing habitat for native threatened, endangered, and sensitive species. DOE does not intend to conduct routine harvesting based upon a regulated schedule similar to other Management Areas. Any actions that could potentially disturb contaminated sediments are addressed through consultation with designated DOE Closure managers, Federal and State regulatory agencies, and are further subject to the Site-Use or Site-Clearance to identify conflicts among organizations. Project specific activities in wetlands are further subject to additional Federal and State policies, guidelines and permitting. There is a need to have silvicultural and harvesting tools available to meet the objectives in the NRMP, rather than re-writing the NRMP to satisfy each project implementation plan.*

SCDNR: I also have specific concerns about increasing allowable clearcut size to 125 acres in the Other Use Management Area (MA1). While the SCDNR agrees with the goal of replacing Slash Pine with native species, clearcuts of this size cause concern. For most wildlife, edges of clearcuts are most valued and utilized. The percentage of this “edge effect” to overall regeneration acreage is greatest in small irregularly shaped cuts. The present OPS Plan specifies clearcut size in the Other Use Area (non-RCW) will range from 10-80 acres not the 100 that is mentioned in this document. The average for all cuts in a compartment would not exceed 40 acres. Increasing allowable cuts to 125 acres would be a significant enlargement and would be less desirable to wildlife.

Response: *The error in the current maximum acreage limit specified in the previous Operations Plan will be corrected from 100 to 80. Only seven slash pine or off-site loblolly stands are affected by the 125 acre limit.*

SCDNR: The SCDNR is fully supportive of expanding prescribed burning on the SRS because of its' benefits to wildlife. What we question is how will this be accomplished and whether it will adversely impact the acreage annually burned at Crackerneck WMA & ER. The USFS annually schedules more acreage for burning than is accomplished, primarily because of regulatory and weather constraints. At the same time, the SCDNR is dependent on the USFS for burning Crackerneck and fulfilling our quail management needs. As long as burning Crackerneck is not down-graded in priority to accomplish burning elsewhere, the SCDNR is fully supportive of increased burning on site.

Response: *Comment noted.*

SCDNR: This document vaguely alludes to increased harvest of hardwoods. This could impact wildlife populations depending on location, acreage involved, species components before and after, etc. Again, specifics are needed to ascertain whether objections should be raised. The OPS Plan will contain these guidelines.

Response: *The actual harvesting of hardwoods is well below targets. There is some expectation it will increase dependent on individual compartment prescriptions.*